

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

BLUE CROSS BLUE SHIELD OF  
MICHIGAN,

Plaintiff,

v.

CORIZON HEALTH, INC.,

Defendant,

**CASE NO. 22-cv-11598**

**HON. MARK A. GOLDSMITH**

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**PLAINTIFF'S LAY WITNESS LIST**

**NOW COMES** Plaintiff, Blue Cross Blue Shield of Michigan, by and through their attorneys, KITCH DRUTCHAS WAGNER VALITUTTI & SHERBROOK, and hereby identifies the following lay witnesses that it expects to call at the time of trial pursuant to per Civ. R. 26:

1. Plaintiff, Blue Cross Blue Shield of Michigan, c/o Counsel

- Yvonne Johnson, Client Engagement Manager, will testify to the information contained within her Affidavit attached to Plaintiff's Complaint, as well as will testify to claim information, billing and delinquency related to Corizon account;

- Jeanie Karam, Manager – Group Audit, will testify regarding audits related to Corizon account;
- Kristi Bekish, Group Audit, will testify regarding audits related to Corizon Account;
- Courtney McCants, Account Service Representative. will testify to claim information, billing and delinquency related to Corizon account;
- Kevin Kent, Underwriter, will testify to claims as well as delinquency related to Corizon account;
- Jason Helling, Manager Key Accounts, will testify to billing and delinquency related to Corizon account;
- Amerique Reynolds, Team Leader – Key State Accounts, will testify to claim information, billing and delinquency related to Corizon account;
- Tomera Yates, group account liaison, will testify to inquiry and reconciliation of claims for Corizon account;
- Trevor Bodary, Financial Coordinator, will testify to billing and delinquency related to Corizon account.

2. Defendant, Corizon Health, Inc., c/o Counsel

- Mason Gill, Vice President of Operations, will provide information relating to Corizon's contract with the State of Michigan and the Michigan Department of Corrections

- M. Therese Brumfield, Vice President Provider Operations, will provide information relating to the execution, negotiation, and termination of the contract between the Parties;
- F. Jeffrey Sholey, Chief Financial Officer, will provide information relating to the execution, negotiation, and termination of the contract between the Parties as well as information relating to Corizon's request for yearly audits from BCBSM;
- Isaac Lefkowitz, Director, will provide information relating to (1) the execution, negotiation, and termination of the contract between the Parties; (2) information relating to Corizon's request for yearly audits from BCBSM; and (3) information relating to Corizon's divisional merger under Texas law and the impact of this merger on Corizon's outstanding liabilities and contractual obligations;
- Andrew Fornes, Senior Claims Director, will provide information relating to Corizon's request for yearly audits from BCBSM;
- Darrell Barker Jr., Senior Claims Director, will provide information relating to Corizon's request for yearly audits from BCBSM;

- Bill Fowler, Sr. Director of Taxation and Leases, will provide information relating to Corizon's request for yearly audits from BCBSM;
  - Any and all employees with information relating to the execution, negotiation, and termination of the contract between the Parties;
  - Any and all employees with information relating to Corizon's payment of claims throughout the term of the contract;
  - Any and all employees with information relating to Corizon's financial situation, which may be used as an excuse for failing to pay;
  - Any and all employees with information relating to Corizon's affirmative defenses in this matter.
3. Any and all entities, which are now or have ever been a subsidiary of Corizon or have assumed any of Corizon's contractual, business or debtor obligations, which includes, but is not limited to:
- Tehum Care Services, Inc., c/o Counsel for Corizon as this entity and Corizon are one and the same:
    - Any and all employees with information relating to Corizon's divisional merger under Texas law and the impact of this merger on Corizon's outstanding liabilities and contractual obligations;

- CHS TX, Inc., c/o Counsel for Corizon as this entity assumed Corizon's employees, contracts, and assets:
  - Any and all employees with information relating to Corizon's divisional merger under Texas law and the impact of this merger on Corizon's outstanding liabilities and contractual obligations;
- Corizon Management, LLC, c/o Counsel for Corizon as this entity and Corizon appear to be one and the same:
  - Isaac Lefkowitz, Chief Executive Office, will provide information relating to Corizon's divisional merger under Texas law and the impact of this merger on Corizon's outstanding liabilities and contractual obligations;
- YesCare Corporation, c/o Counsel for Corizon as this entity also retained Corizon's contracts and does business under the Corizon name:
  - Sara Tirschwell, CEO of both YesCare and Corizon, will provide information relating to Corizon's divisional merger under Texas law and the impact of this merger on Corizon's outstanding liabilities and contractual obligations;

- Any and all employees with information relating to Corizon's divisional merger under Texas law and the impact of this merger on Corizon's outstanding liabilities and contractual obligations;
- PharmaCorr, c/o Counsel for Corizon as this entity and Corizon appear to be one and the same:
  - Bill Fowler, Chief Financial Officer (Sr. Director of Taxation and Leases for Corizon), will provide information relating to Corizon's request for yearly audits from BCBSM;
  - Any and all employees with information relating to Corizon's contract with State of Michigan as well as with information relating to Corizon's contract with BCBSM.

4. State of Michigan:

- Marti Kay Sherry, Program Manager for the Michigan Department of Corrections (206 E Michigan Ave, Lansing, MI 48933; (517) 335-1426) will provide information relating to Corizon's contract with the State of Michigan and the Michigan Department of Corrections;
- Brandon Samuel, Contract Administrator for the Department of Technology, Management, and Budget (525 W Allegan Street, Lansing, MI 48913; (517) 249-0439) will provide information relating

to Corizon's contract with the State of Michigan and the Michigan Department of Corrections;

- Mike Kennedy, Contract Administrator for the Department of Technology, Management, and Budget (525 W Allegan Street, Lansing, MI 48913; (517) 284-6397) will provide information relating to Corizon's contract with the State of Michigan and the Michigan Department of Corrections;
- Any and all employees of the State of Michigan with information relating to Corizon's contract with the Michigan Department of Corrections.

5. AmWINS Benefit Watch, Inc. (50 Whitecap Dr, North Kingstown, RI 02852; (401) 739-3330), including, but not limited to:

- Mark Lawlor, Senior Vice President, will provide information relating to Corizon's request for audits from BCBSM;
- Any and all employees with information relating to audits performed at the request of Corizon during the lifetime of the Contract between BCBSM and Corizon.

6. Any and all lay witnesses named by Defendant.

7. Any and all necessary and/or desired rebuttal and/or impeachment witnesses.

8. Any and all witnesses necessary to lay a proper foundation for an exhibit to be offered by Plaintiff at trial.
9. Plaintiff reserves the right to supplement this list as discovery is ongoing.
10. Pursuant to Fed. R. Civ. P. 26(a)(2), Plaintiff will disclose all retained and non-retained expert witnesses in accordance with this Court's Scheduling Order and/or the Federal Rules of Civil Procedure. Plaintiff will also disclose the reports of their retained experts by the deadline set forth in the Court's Scheduling Order and/or in accordance with the Federal Rules of Civil Procedure.
11. Plaintiff reserves the right to elicit expert testimony from any and all of these witnesses within their respective areas of expertise.

Respectfully submitted,

KITCH DRUTCHAS WAGNER  
VALITUTTI & SHERBROOK

*/s/ Gabe Sybesma*

By: \_\_\_\_\_  
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Dated: January 19, 2023



LOCAL RULE CERTIFICATION: I, Gabe Sybesma, certify that this document complies with Local Rule 5.1(a), including: double-spaced (except for quoted materials and footnotes); at least one inch margins on the top, sides, and bottom; consecutive page numbering; and type size of all text and footnotes that is no smaller than 10-1/2 characters per inch (for non-proportional fonts) or 14 point (for proportional fonts). I also certify that it is the appropriate length. Local Rule 7.1(d)(3).

/s/ Gabe Sybesma

Gabe Sybesma (P66632)

**DECLARATION OF SERVICE**

The undersigned certifies that on January 19, 2023 a copy of Plaintiff's Lay Witness List was served upon all attorneys/parties to the above cause by electronic filing with the Clerk of the Court using the E-File and E-Serve System which will send notification of such filing to the foregoing.

I declare under the penalty of perjury that the statement above is true to the best of my information knowledge and belief.

/s/ Paul Wilk Jr

Paul Wilk Jr